

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
24-20374-CR-MARTINEZ/SANCHEZ
Case No. _____

18 U.S.C. § 371

18 U.S.C. § 981(a)(1)(C)

UNITED STATES OF AMERICA

v.

GAL HAIMOVICH,

Defendant.

FILED BY MP D.C.

Aug 28, 2024

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - Miami

INFORMATION

The United States Attorney charges that:

CONSPIRACY TO COMMIT AN OFFENSE AGAINST THE UNITED STATES
(18 U.S.C. § 371)

1. Between at least in or around March 2022, and continuing through in or around May 2023, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

GAL HAIMOVICH,

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly, combine, conspire, confederate, and agree with other persons, known and unknown to the United States Attorney, to commit an offense against the United States, that is:

(a) to export and cause to be exported, from the United States to Russia, aircraft parts controlled and identified on the Commerce Control List, without first having obtained the required authorization and license from the U.S. Department of Commerce ("DOC"), in violation of Title 50, United States Code, Sections 4819(a)(1) and (a)(2)(A)–(E), (G), 4819(b), and Title 15, Code of

Federal Regulations, Section 736.2(b)(1); and

(b) to fraudulently and knowingly export and send from the United States any merchandise, article, and object, contrary to any law and regulation of the United States, and receive, conceal, buy, sell, and in any manner facilitate the transportation, concealment, and sale of such merchandise, article, and object, prior to exportation, knowing the same to be intended for exportation contrary to any law and regulation of the United States, in violation of Title 18, United States Code, Section 554(a).

PURPOSE OF THE CONSPIRACY

2. It was the purpose of the conspiracy for the defendant and his co-conspirators to unlawfully enrich themselves by exporting and smuggling, from the United States to Russia, aircraft parts and components that were controlled on the Commerce Control List, without first having obtained the required authorization and license from the DOC; and to conceal their smuggling by making false and misleading representations, statements, and certifications, and by falsifying export documents filed or required to be filed pursuant to the Export Administration Regulations, in order to deceive U.S. officials and private companies about the true destination of the parts and components.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish the purpose and objects thereof, the defendant and his co-conspirators committed and caused to be committed, in the Southern District of Florida, and elsewhere, at least one of the following overt acts:

1. On or about July 28, 2022, a co-conspirator sent an e-mail to defendant **GAL HAIMOVICH** directing **HAIMOVICH** to “arrange transportation to Moscow” of an aircraft part called an “air data module”—a sensor that assists an airplane pilot’s navigation. The air data module was controlled on the Commerce Control List under ECCN 7A994 for “anti-terrorism” reasons and required a license for export to Russia. In the conclusion of the e-mail, the co-conspirator stated, in red, highlighted text: “the actual shipper should not know that the cargo is following to Russia!”

2. On or about August 2, 2022, defendant **GAL HAIMOVICH** directed a co-conspirator to falsely inform the air data module’s U.S. vendor that the part would be shipped to a company in the Maldives.

3. On or about August 4, 2022, defendant **GAL HAIMOVICH** caused the air data module to be shipped to its actual destination in Moscow, Russia.

4. On or about September 11, 2022, defendant **GAL HAIMOVICH** attempted to export an aircraft part called an “air data and inertial reference unit,” which supplies information to an airplane pilot’s electronic flight instrument system displays, from Miami, Florida, to Russia. The air data and inertial reference unit was controlled on the Commerce Control List under ECCN 7A103.a for “missile technology” reasons and required a license for export to Russia.

5. On or about September 11, 2022, a co-conspirator sent an e-mail directing defendant **GAL HAIMOVICH** to conceal from the air data and inertial reference unit’s U.S. vendor the part’s actual destination in Moscow, Russia.

6. Between in or around September 2022, and continuing through in or around October 2022, defendant **GAL HAIMOVICH** caused to be filed false and fraudulent electronic export information—required documentation submitted to the U.S. Government in connection with certain export shipments from the United States—in order to conceal the ultimate recipient of aircraft fuel pumps exported by the defendant from the United States to his co-conspirators in Russia.

7. Between in or around March 2023 through in or around May 2023, defendant **GAL HAIMOVICH** sent invoices to various customers and co-conspirators seeking payment of at least \$2,024,435.44 in exchange for **HAIMOVICH**'s facilitation of the unlawful export of aircraft parts and components to Russia.

All in violation of Title 18, United States Code, Section 371.

FORFEITURE ALLEGATIONS

1. The allegations of this Information are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **GAL HAIMOVICH**, has an interest.

2. Upon conviction of a conspiracy to commit a violation of Title 50, United States Code, Section 4819, as alleged in this Information, the defendant shall forfeit to the United States any property: (a) used or intended to be used, in any manner, to commit or facilitate the offense; (b) constituting or traceable to the gross proceeds taken, obtained, or retained, in connection with or as a result of the offense; and (c) constituting an item or technology that is exported or intended to be exported in violation of Title 50 Chapter 58, Subchapter I, pursuant to Title 50, United States Code, Section 4819(d).

3. Upon conviction of a conspiracy to commit a violation of Title 18, United States Code, Section 554, as alleged in this Information, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

4. The property subject to forfeiture as a result of the alleged offenses includes, but is not limited to, the following:

a. A forfeiture money judgment in the sum of \$2,024,435.44 in U.S. currency, which sum represents the value of the property subject to forfeiture;

b. directly forfeitable property, including, but not limited to:

- (i) The real property located at 3331 Northwest 82nd Avenue, Doral, Florida 33122;
- (ii) One (1) Maxjet Shipment Package to New Delhi;
- (iii) One (1) Reliance Aircraft Package to Serbia, Invoice #18239;
- (iv) One (1) Magellan Aviation Delivery to Serbia, Shipment # SM 1029767;
- (v) One (1) Aircraft Service and Specialty Package Invoice #5350127;
- (vi) One (1) Safran Cabin Inc. Package c/o #002308901;
- (vii) One (1) Yokohama AirSpace Shipment to Siberia Airlines #P9717522;
- (viii) One (1) Maxjet Invoice #KELF3V;
- (ix) One (1) Setec Aero PO 229251 Shipper Proponent Package to China;
- (x) One (1) Ethiopia Airlines Honeywell Package to Setec Aero;
- (xi) One (1) Maxjet Service Moldova P010747 Package;
- (xii) One (1) Griselda Proponent CTI USA Package;

- (xiii) One (1) Boeing Package #SHB02556830;
- (xiv) One (1) Package to Maxjet Moldova Invoice #12151;
- (xv) Five (5) Setec Aero Tires to Dubai;
- (xvi) One (1) Tre Aero Package 50 #50-17418;
- (xvii) Twenty-five (25) Nelson Parts Boxes;
- (xviii) One (1) Lumijet aircraft parts;
- (xix) One (1) Control Main Engine Serial #WYG85607;
- (xx) One (1) Set of Proponent Main Parts;
- (xxi) Two (2) Sets of Boeing Aircraft Parts; and
- (xxii) One (1) Constant Speed Drive Part #735511A.

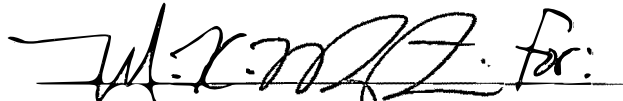
All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 50, United States Code, Section 4819(d) and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 28, United States Code, Section 2461(c).



MARKENZY LAPOINTE
UNITED STATES ATTORNEY



CHRISTOPHER B. BROWNE
ASSISTANT UNITED STATES ATTORNEY



CHRISTOPHER M. RIGALI
TRIAL ATTORNEY
U.S. DEPARTMENT OF JUSTICE NATIONAL SECURITY
DIVISION
COUNTERINTELLIGENCE & EXPORT CONTROL SECTION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.: 24-20374-CR-MARTINEZ/SANCHEZ

v.

GAL HAIMOVICH,

CERTIFICATE OF TRIAL ATTORNEY

Defendant.

Court Division (select one)

- ☒ Miami ☐ Key West ☐ FTP
☐ FTL ☐ WPB

Superseding Case Information:

New Defendant(s) (Yes or No) NoNumber of New Defendants Total number of new counts

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. ~~I am aware that the information supplied on this statement will be~~ relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) Yes
List language and/or dialect: Hebrew
4. This case will take 0 days for the parties to try.
5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)

| | |
|---|--|
| I <input checked="" type="checkbox"/> 0 to 5 days | <input type="checkbox"/> Petty |
| II <input type="checkbox"/> 6 to 10 days | <input type="checkbox"/> Minor |
| III <input type="checkbox"/> 11 to 20 days | <input type="checkbox"/> Misdemeanor |
| IV <input type="checkbox"/> 21 to 60 days | <input checked="" type="checkbox"/> Felony |
| V <input type="checkbox"/> 61 days and over | |
6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
7. Has a complaint been filed in this matter? (Yes or No) Yes
If yes, Magistrate Case No. 23-mj-03087-REID
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of _____
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) No
15. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
16. Did this matter involve the participation of or consultation with now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No

By: 

CHRISTOPHER B. BROWNE

Assistant United States Attorney

FL Bar No.

91337

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: GAL HAIMOVICH

Case No: _____

Count #:

Conspiracy

Title 18, United States Code, Section 371

*** Max. Term of Imprisonment: Five (5) years**

*** Mandatory Min. Term of Imprisonment (if applicable): N/A**

*** Max. Supervised Release: Three (3) years**

*** Max. Fine: The greater of \$250,000 or twice the pecuniary gain derived from the offense**

***Refers only to possible term of incarceration, supervised release, and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

AO 455 (Rev. 01/09) Waiver of an Indictment

UNITED STATES DISTRICT COURT

for the
Southern District of Florida

United States of America

V.

GAL HAIMOVICH

Defendant

Case No.

24-20374-CR-MARTINEZ/SANCHEZ

WAIVER OF AN INDICTMENT

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: 8.23.2024

Defendant's signature

Signature of defendant's attorney

David Seltzer

Printed name of defendant's attorney

Judge's signature

Judge's printed name and title